

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DREW MACEWEN, ANDREW BARKIS,
CHRIS CORRY, BRANDON VICK, KELLY
CHAMBERS, MICHAEL MCKEE, FRAN
WILLS, BRUCE RUSSELL, Phil Fortunato,
Dave McMullan, Isaac Vellekamp, and Marcus
Torrey,

Plaintiffs,

v.

JAY INSLEE, in my official capacity as the
Governor of Washington,

Defendant.

No. 3:20-cv-05423

DECLARATION OF BRANDON VICK

I, Brandon Vick, make the following declaration under penalty of perjury:

1. I am a plaintiff in the above-entitled action and have personal knowledge of the facts stated herein.
2. I am a resident of Clark County, Washington, and elected state representative for the 18th Legislative District.
3. My daughter normally attends public school in Washington state.
4. My daughter also relies on her school to provide education supplies and educational resources aside from direct instruction.
5. My daughter's school is closed as a result of the Proclamations.
6. But for the Proclamations, my daughter would still be attending school.

- 1 7. My daughter is deprived of her ability to attend school due to the Proclamations.
- 2 8. The school district has provided virtually no alternative means of education.
- 3 9. The burden of educating my daughter has been placed wholly upon my shoulders.
- 4 10. I am not equipped or qualified to educate my daughter on my own.
- 5 11. My daughter is also deprived of educational supplies and educational resources aside from
- 6 direct instruction due to the Proclamations.
- 7 12. My daughter is functionally being deprived of an education due to the Proclamations.
- 8 13. I also normally rely on childcare for my children.
- 9 14. My childcare providers are closed as a result of the Proclamations.
- 10 15. But for the Proclamations, I would be placing my children in childcare while I fulfil my other
- 11 obligations.
- 12 16. I am deprived of my ability to place my children in childcare due to the Proclamations.
- 13 17. I am deprived of my ability to fulfil my other obligations due to the Proclamations.
- 14 18. I also normally attend church in Washington state.
- 15 19. I and my fellow congregants are Bible-believing Christians who are compelled, as a matter of
- 16 religious conscience, to “not forsak[e] the assembling of ourselves together” in physical,
- 17 corporate worship. Hebrews 10:25 (KJV).
- 18 20. My church is closed as a result of the Proclamations.
- 19 21. But for the Proclamations, my church would be open.
- 20 22. I am deprived of the ability to worship at church due to the Proclamations.
- 21 23. I am moreover deprived of the ability to fulfil a critical religious obligation due to the
- 22 Proclamations.
- 23 24. I am also deprived of the fellowship I normally enjoy at church due to the Proclamations.
- 24 25. I also normally donate my time and services to events held by nonprofit organizations.
- 25 26. The events held by nonprofit organizations to which I donate my time and services are
- 26 cancelled as a result of the Proclamations.
- 27

1 27. But for the Proclamations, I would be donating my time and services to the events held by
2 nonprofit organizations.

3 28. I am deprived of my ability to donate my time and services to events held by nonprofit
4 organizations due to the Proclamations.

5
6 SIGNED, May 24, 2020, at VANCOUVER, Washington.

7
8 
9 By: _____
Brandon Vick